

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Chapter 7 Estate of Bernard L.
Madoff,

Plaintiff,

v.

NATIXIS FINANCIAL PRODUCTS LLC and
BLOOM ASSET HOLDINGS FUND,

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 23-01017 (CGM)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

To the Clerk of this Court and all parties of record:

PLEASE TAKE NOTICE that the undersigned hereby appears in the above captioned adversary proceeding on behalf of Defendants Natixis Financial Products LLC (as successor in interest to Natixis Financial Products Inc.) and Bloom Asset Holdings Fund (collectively “Defendants”) and requests that all notices, pleadings, motions, applications, and other documents filed or served in this case, be given to and served upon the undersigned.

PLEASE TAKE FURTHER NOTICE that this appearance is not, and shall not be deemed

to be, a waiver of the above-named parties' rights (1) to have final orders in noncore matters entered only after de novo review by a District Court Judge, (2) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to any other rights, claims, actions, setoffs, or recoupments to which the above-named parties are or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, and recoupments the above-named parties expressly reserve, or (5) to any and all defenses or objections the above-named parties may have to the claims asserted against them in this action, including, without limitation, any defense based on insufficient service of process, jurisdiction (including personal jurisdiction), or capacity to be sued, except to the extent expressly waived in writing in this proceeding.

Dated: April 10, 2023
New York, New York

DAVIS+GILBERT LLP

By: /s/ H. Seiji Newman
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*Attorneys for Defendants Natixis Financial
Products LLC (as successor-in-interest to
Natixis Financial Products, Inc.) and Bloom
Asset Holdings Fund*